

P.O. Box 10246  
Birmingham, Alabama 35202

Telephone: 205 849-1300  
Telex: 82-1269



MAY 31, 1990

Mr. David McNeal  
Air Compliance Branch  
U. S. Environmental Protection Agency, Region IV  
345 Courtland Street, N. E.  
Atlanta, Georgia 30365

Dear Mr. McNeal:

Pursuant to Section 112 of the Clean Air Act Regulation 40 C.F.R. Part 61, Subpart FF, attached you will find our waste stream regulatory status. Maximum flow and maximum concentration were used to generate a "worst case" analysis. Please note our benzene concentration is far below the 10 ppmw limit and far below the 1 Mg/yr. interim limit.

If you require further information please contact Steve Morgan at (205) 849-1338.

Sincerely,

DRUMMOND COMPANY, INC.

A handwritten signature in dark ink, appearing to read 'W. M. Poling', written over the typed name.

W. M. Poling  
Manager Engineering, Maintenance  
and Environmental Control



A Division of Drummond Company, Inc.

Drum\_00166005

Drum\_00166006

**Figure 4. Example Table Format for Reporting Waste Stream Regulatory Status**

P.O. Box 10246  
Birmingham, Alabama 35202

Telephone: 205 849-1300  
Telex: 82-1269  
Fax: 205 849-1322



July 2, 1991

Mr. Richard E. Grusnick, Chief  
Air Division  
Alabama Department of Environmental Management  
1751 Dickinson Drive  
Montgomery, AL 35130

Dear Mr. Grusnick

Please find attached the source report requested by you memo of June 25, 1991. There are no calculations on emissions in our effluent water. Our NPDES permit requires that we test this water for Benzene. Over the last year results have been zero. The lowest detectable limit of this test is five parts per billion.

Sincerely,

ABC COKE DIVISION

A handwritten signature in dark ink, appearing to read 'W.M. Poling', written over a horizontal line.

W.M. Poling  
Manager Engineering, Maintenance  
and Environmental Control

Attachments

WMP/sm

Drum\_00166002



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

4APT-AEB

JUN 25 1991

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. W. M. Poling  
Manager Engineering, Maintenance and Environmental Control  
ABC Coke  
P. O. Box 10246  
Birmingham, Alabama 35202

Subject: National Emission Standard for Benzene Waste Operations  
[40 C.F.R. Part 61, Subpart FF]

Dear Mr. Poling:

This letter is written to acknowledge receipt of the benzene waste report for ABC Coke submitted under the provisions of 40 C.F.R. Part 61, Subpart FF. Although the report submitted meets the requirements of §61.357, owners or operators of existing sources or new sources that started up prior to the effective date are also required to submit an initial source report under the provisions of 40 C.F.R. §61.10. Please submit the source report within 20 calendar days of receipt of this letter.

As of February 20, 1991, authority for implementation of 40 C.F.R. Part 61, Subpart FF was delegated to the State of Alabama. Therefore, please forward all future correspondence concerning the Benzene Waste Operations NESHAP to:

Mr. Richard E. Grusnick, Chief  
Air Division  
Alabama Department of Environmental Management  
1751 Congressman W. L. Dickinson Drive  
Montgomery, Alabama 36109

If you have any questions about this letter, please contact Jill Perry of my staff at (404) 347-2904.

Sincerely yours,

  
Jewell A. Harper, Chief  
Air Enforcement Branch  
Air, Pesticides & Toxics Management Division

cc: Mr. Richard E. Grusnick, Chief  
Air Division  
Alabama Department of Environmental Management

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**JEFFERSON COUNTY DEPARTMENT OF HEALTH**

1400 SIXTH AVENUE SOUTH P.O. BOX 2648 BIRMINGHAM, ALABAMA 35202 205/933-9110

**Bureau of Environmental Health**  
James L. Carroll, Director

May 26, 1993

Mr. Steve Morgan  
Environmental Engineer  
ABC Coke  
P.O. Box 10246  
Birmingham, AL 35202

Dear Mr. Morgan:

Re: National Emission Standards for Benzene Waste  
Operations (40 CFR 61, Subpart FF)

In a letter from EPA Region IV dated June 25, 1991 each facility subject to Subpart FF of 40 CFR 61 was instructed to submit correspondence required by this Subpart to ADEM. The Jefferson County Department of Health Air Pollution Control Program has been delegated authority for implementation of Subpart FF; therefore, please forward all future correspondence and reports to this office.

If you have any questions about this matter, please contact Mr. Henry Burnett of the Air Program Staff.

Sincerely,

James L. Carroll, Director  
Bureau of Environmental Health

/cdm

c: Jewell A. Harper, Chief  
Air Enforcement Branch  
Air, Pesticides & Toxics Management Division  
U.S. EPA Region IV

Richard E. Grushnick, Chief  
Air Division  
ADEM

PROTECTING **YOUR** HEALTH



Drum\_00166000

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Birmingham, Alabama 35202

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May 13, 1993

Mr. Walter Allen  
Bureau of Environmental Health  
Jefferson County Department of Health  
P.O. Box 2648  
Birmingham, Al 35202

Dear Mr. Allen

Please find attached the Benzene Waste documentation you requested. Please note that included is a memo from USEPA dated June 25, 1991 that indicates that the state has primacy over Subpart FF. We were unaware that the status of Subpart FF had changed.

Sincerely,

ABC COKE DIVISION

A handwritten signature in black ink, appearing to read 'S. Morgan', written over a horizontal line.

S. Morgan  
Environmental Engineer

P.O. BOX 10240  
Birmingham, Alabama 35202

Telephone: 205 849-1300  
Telex: 82-1269  
Fax: 205 849-1322



*mm*

April 7, 1993

Mr. Richard E. Grusnick, Chief  
Air Division  
Alabama Department of Environmental Management  
Air Division  
1751 Dickinson Drive  
Montgomery, Al 35130

Dear Mr. Grusnick

Ref. USEPA final rule (58 Fed. Reg. 3072) Benzene Waste NESHA  
(Subpart FF).

ABC Coke a Division of Drummond Co. Inc. previously submitted reports  
as required when this rule was first published.

The Preamble to the amended rule states " A facility that has  
previously submitted this report to the EPA or to the delegated State  
or local agency and, after reviewing the clarifying amendments  
promulgated today, believes that the previous report is accurate, may  
submit a statement to this effect rather than resubmitting the entire  
previous report."

ABC Coke believes that our initial reports were accurate and fulfill  
the obligations of the final rule.

If we can be of further assistance please contact Steve Morgan at  
205/849-1338.

Sincerely,

ABC COKE DIVISION

*W.M. Poling*  
W.M. Poling  
Manager Engineering and  
Environmental Control

WMP/sm



A Division of Drummond Company, Inc.

Drum\_00225772



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
100 ALABAMA STREET, S.W.  
ATLANTA, GEORGIA 30303-3104

FEB 13 1997

4APT-ARB

Mr. Steve Morgan  
Environmental Engineer  
ABC Coke  
P.O. Box 10246  
Birmingham, AL 35202

SUBJ: 40 CFR Part 61, Subpart FF (National Emission Standard  
for Benzene Waste Operations) - Future Reporting  
Requirements

Dear Mr. Morgan:

The purpose of this letter is to inform you that, effective immediately, all reports pursuant to 40 CFR §61.357 should be submitted to the State or local air pollution agency where your source is located. In Region 4 the United States Environmental Protection Agency (EPA) has delegated 40 CFR Part 61, Subpart FF to most State or local air pollution agencies, and in those states that have not yet officially received delegation of Subpart FF, EPA expects those states to implement non-delegated subparts until delegation becomes effective.

Therefore, it will no longer be necessary for you to submit the report(s) to EPA Region 4.

If you have any questions regarding the issues addressed in this letter, please contact Mr. Lee Page of my staff at (404) 562-9131.

Sincerely yours,

A handwritten signature in cursive script, reading "R. Douglas Neeley", is positioned above the typed name.

R. Douglas Neeley  
Chief  
Air and Radiation Technology Branch  
Air, Pesticides, & Toxics  
Management Division

Enclosure

cc: State/Local Air Director